

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
**GUSTAVO ADOLFO RODRIGUEZ
COTT**

Debtor

SOPRAMCO CV9 CFL, LLC

Movant

VS.

**GUSTAVO ADOLFO RODRIGUEZ
COTT, and Alejandro Oliveras Rivera, as
Chapter 13 Trustee**

Respondents

CASE NO. 10-09533-SEK

CHAPTER 13

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**REPLY TO MOTION REQUESTING RELIEF FROM STAY UNDER 11 U.S.C. §362
FILED BY SOPRAMCO**

TO THE HONORABLE COURT:

COMES NOW Debtor, represented by the undersigned attorney, and represents as follows:

1. On June 9, 2011, secured creditor Sopramco CV9 CFL, LLC (movant) filed a motion for relief from the automatic stay alleging Debtor had four post petition mortgage arrears for the months of March, April, May and June, 2011 for the total amount of \$6,716.41.
2. On June 21, 2011 an extension of time was granted in order to answer said motion and cure the alleged arrears with Creditor. An additional month transpired, increasing the arrears owed to Movant to \$8,992.35.
3. As of this day, Debtor has not been able to gather the full amount of money owed to Movant.
4. Debtor is an independent consultant and in the last three months some of his clients failed to pay him on time, which seriously affected his monthly income. Debtor is now in the

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process of collecting the money owed by his clients, which helps him cure his arrears to Creditor Sopramco.

5. As of this day, Debtor has gathered \$6,700.00; which will be handed to Movant at the final hearing to be held on July 29, 2011.

6. Debtor, however, still needs additional time to gather the remaining \$2,292.35 that he owes. Debtor expects to cure the arrears to Movant, including August, 2011 within 21 days from the date of the final hearing.

WHEREFORE, debtor pray from this Honorable Court to take notice of the above, and grant Debtor an extension of 21 additional days from the day of the final hearing to cure the arrears owed to Movant Sopramco.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification, upon information and belief, of such filing to: SERGIO A. RAMIREZ DE ARELLANO to Banco Popular Center, Suite 1133, 209 Muñoz Rivera Ave. San Juan, PR 00918-1009, Attorney for Movant and Alejandro Oliveras Rivera, as Chapter 13 Trustee.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, July 21, 2011.

s/José L. Jiménez Quiñones
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